


Maintenance Operations
San Francisco International Airport, San Francisco, California 94128



March 3, 2000

U.S. Department of Transportation Dockets
Docket No. FAA-99-6717
400 Seventh Street, SW
Room Plaza 401
Room 915-GAGC-200
Washington DC 20590

207 Minute ETOPS proposal for Docket No.FAA-99-6717. Public Comment.

To whom this may concern.

United Airlines is currently the largest 777 operator with forty two aircraft in service. Recently United surpassed five hundred thousand flight hours of operations with the Boeing 777.

UAL is a proactive and supportive member of the FAA/ATA ETOPS Sub Committee in the development of 207 minute Extended Range Operation Proposal. Our Sub Committee inputs are based upon extensive UAL 777 International operational experience.

United Airlines is confident that the proposal for 207-minute Extended Twin Operations rules in the North Pacific is appropriate.

The mere existence of 207-minute rules will raise the standards for maintenance and configuration of the 777 fleet, even during flights when the increase in diversion authority is not being exercised. Aircraft system requirements and Minimum Equipment List for 207 minute dispatch are more restrictive than for 180 minutes. Operators such as United Airlines will tend to configure and continually maintain the fleet at this higher standard in readiness for those occasions when 207-minute dispatch is necessitated by rapidly changing alternate airport weather situations.

United Airlines requests a minor change to Docket # FAA-99-6717 Page 3522 FAA Response to Discussion of Comments from the Previous Notice #3.

The following sentence should be changed:

“For the proposal at hand, the 207 minute ETOPS Operations are intended to apply only in the North Pacific area of operation, and then, only when conditions prevent a

180-minute dispatch.”

The revised sentence should read:

“For the proposal at hand, the 207-minute ETOPS Operations are intended to apply only in the North Pacific area of operation when one of the following situations exists:

A) When conditions prevent a 180-minute dispatch.

B) When conditions force a 180-minute dispatched flight to substantially alter its course f

from normal routing to keep within 180-ETOPS from a suitable alternate airfield.

An example of situation B)

When only Anchorage, Midway and Chitose are available as suitable alternate stations, a 777-222B aircraft can be dispatched at 180-minute ETOPS from Seattle to Narita providing the aircraft doglegs Southwards to pickup the Midway 180-minute isochrone radial. This course alteration would position the aircraft into a frequently occurring jet stream, head-wind. The resulting additional mileage & head wind components can cause flight time increases of up to 1 hour and 47 minutes. In addition, altered courses such as this would require an additional 23,000 pounds of fuel and a 25,000 pound payload penalty.

Use of 207-minutes ETOPS is a safe and appropriate application for situation B). 207-minute allowance only when 180-minute ETOPS is not feasible is overly restrictive to United Airlines, the other 777 Operators in the Northern Pacific, and the traveling public in general.

Thank you for your consideration of these responses.

Tom Edwards
United Airlines SFOML
ETOPS Maintenance Programs

Chris Barnes
United Airlines SFOLM
ETOPS Line Coordinator